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U.S. DISTRICT COURT
SOUTHERN DIST OHIO
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

ZACHARY HARRIS,
RICKVUION SCOTT,
a/k/a "Cubb,"
TEAGUE JACKSON,
EDWARD WASHINGTON,
MONTREAL WILLIAMS, and
MARKENDRA CARTER,

Defendants.

CASE NO. **1:24CR 050**

JUDGE **J. HOPKINS**

INDICTMENT

18 U.S.C. § 2
18 U.S.C. § 371
18 U.S.C. § 922(a)(6)
18 U.S.C. § 1028A
18 U.S.C. § 1029(a)(2)

FORFEITURE ALLEGATIONS

THE GRAND JURY CHARGES:

Introduction

1. At times relevant to this Indictment:

a. Range USA – Cincy West at 7266 Harrison Ave., Cincinnati, OH 45247 ("Range USA") was a licensed dealer of firearms (also known as a federal firearms licensee or "FFL") within the meaning of Chapter 44, Title 18, United States Code.

b. The defendants, **ZACHARY HARRIS, RICKVUION SCOTT, TEAGUE JACKSON, EDWARD WASHINGTON, MONTREAL WILLIAMS, and MARKENDRA CARTER**, were residents of the Southern District of Ohio.

COUNT 1

(Conspiracy to Commit an Offense Against the United States)

The Conspiracy

2. Paragraph 1 of the Indictment is incorporated here.

3. From on or about September 24, 2023, through on or about September 26, 2023, in the Southern District of Ohio, the defendants, **ZACHARY HARRIS, RICKVUION SCOTT, TEAGUE JACKSON, EDWARD WASHINGTON, MONTREAL WILLIAMS,** and **MARKENDRA CARTER**, knowingly and intentionally conspired and agreed with each other, and with others known and unknown to the grand jury, to commit an offense against the United States, that is, to knowingly make a false oral and written statement to a licensed dealer of firearms, as that term is defined in Chapter 44, Title 18, United States Code, in connection with the acquisition and attempted acquisition of a firearm, which statement was intended and likely to deceive the said licensed dealer of firearms as to a fact material to the lawfulness of such sale of the said firearm to the defendant under Chapter 44, Title 18, United States Code, in violation of Title 18, United States Code, Section 922(a)(6).

Manner and Means of the Conspiracy

4. The manner and means by which the defendants, **ZACHARY HARRIS, RICKVUION SCOTT, TEAGUE JACKSON, EDWARD WASHINGTON, MONTREAL WILLIAMS,** and **MARKENDRA CARTER**, and others known and unknown to the grand jury, sought to accomplish the objectives of the conspiracy included the following:

- a. It was part of the conspiracy that a member of the conspiracy would place an online order with Range USA for multiple firearms.
- b. It was further part of the conspiracy that, at times, members of the conspiracy would purchase the firearms using another individual's credit card information, without that individual's authorization.

c. It was further part of the conspiracy that, when a member of the conspiracy purchased firearms online, that member would do so in the name of another member of the conspiracy.

d. It was further part of the conspiracy that a member of the conspiracy would complete the transfer of the firearms at Range USA.

e. It was further part of the conspiracy that, in completing the transfer of the firearms, a member of the conspiracy would falsely represent on a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473 – Firearms Transaction Record (“ATF Form 4473”) that he or she was the actual buyer of the firearms, when in fact he or she was purchasing at least one of the firearms for another member of the conspiracy.

Overt Acts

5. In furtherance of the conspiracy, and to effect the object thereof, the conspirators performed and caused to be performed the following overt acts, among others:

a. On or about September 24, 2023, **MONTREAL WILLIAMS** texted **MARKENDRA CARTER’S** full name, and the address that was then on her driver’s license, to **RICKVUION SCOTT**.

b. On or about September 25, 2023, a member of the conspiracy placed an online order with Range USA for a Glock Model 40 10mm caliber pistol and a Taurus Model G3C 9mm caliber pistol. The order was placed in the name of **MARKENDRA CARTER** and was paid for using the stolen credit card information of T.R.

c. On or about September 25, 2023, **RICKVUION SCOTT** texted **MONTREAL WILLIAMS**, “Morrow Ohio.”

d. On or about September 25, 2023, **MARKENDRA CARTER**, at Range USA, completed the transfer of the Glock Model 40 10mm caliber pistol and the Taurus Model G3C 9mm caliber pistol.

e. On or about September 25, 2023, **MARKENDRA CARTER** submitted an ATF Form 4473 to Range USA on which she falsely represented that she was the actual transferee/buyer of the Glock Model 40 10mm caliber pistol and the Taurus Model G3C 9mm caliber pistol.

f. On or about September 25, 2023, **TEAGUE JACKSON** texted **ZACHARY HARRIS**, "Send ma y'all addi or y'all want me to meet u there."

g. On or about September 25, 2023, **ZACHARY HARRIS** texted **TEAGUE JACKSON**, "Meet after."

h. On or about September 25, 2023, a member of the conspiracy placed an online order with Range USA for two Glock Model 19 Gen 5 9mm caliber pistols and a Del-Ton, Inc., Model DTI-15 5.56 caliber rifle. The order was placed in the name of **TEAGUE JACKSON** and was paid for using the stolen credit card information of M.R.

i. On or about September 25, 2023, **TEAGUE JACKSON**, at Range USA, completed the transfer of the two Glock Model 19 Gen 5 9mm caliber pistols and the Del-Ton, Inc., Model DTI-15 5.56 caliber rifle.

j. On or about September 25, 2023, **TEAGUE JACKSON** submitted an ATF Form 4473 to Range USA on which he falsely represented that he was the actual transferee/buyer of the two Glock Model 19 Gen 5 9mm caliber pistols and the Del-Ton, Inc., Model DTI-15 5.56 caliber rifle.

k. On or about September 26, 2023, a member of the conspiracy placed an online order with Range USA for a Glock Model 19 Gen5 9mm caliber pistol, a Glock Model 26 Gen5 9mm caliber pistol, and a Glock Model 27 .40 caliber pistol. The order was placed in the name of **EDWARD WASHINGTON** and was paid for using the stolen credit card information of A.C.

l. On or about September 26, 2023, **EDWARD WASHINGTON**, at Range USA, completed the transfer of the Glock Model 19 Gen5 9mm caliber pistol, the Glock Model 26 Gen5 9mm caliber pistol, and the Glock Model 27 .40 caliber pistol.

m. On or about September 26, 2023, **EDWARD WASHINGTON** submitted an ATF Form 4473 to Range USA on which he falsely represented that he was the actual transferee/buyer of the Glock Model 19 Gen5 9mm caliber pistol, the Glock Model 26 Gen5 9mm caliber pistol, and the Glock Model 27 .40 caliber pistol.

In violation of Title 18, United States Code, Section 371.

COUNTS 2-4
(False Statement During Purchase of Firearm)

6. Paragraph 1 of the Indictment is incorporated here.

7. On or about the following dates, in the Southern District of Ohio, the defendants listed below, in connection with the acquisition of a firearm from Range USA, knowingly made a false and fictitious written statement to Range USA as to a fact material to the lawfulness of such sale of the said firearm to the defendants under Chapter 44 of Title 18, United States Code, in that the defendants did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, to the effect that that individual listed below was the actual transferee/buyer of the firearm listed on the Form 4473,

when in fact, as the defendants then knew, the individual listed below was not the actual transferee/buyer of the firearm:

Count	Date, on or about	Firearm(s)	Defendants	Person Falsely Represented to be Actual Transferee/Buyer
2	9/25/23	A Glock Model 40 10mm caliber pistol, Serial No. CAKZ049; and a Taurus Model G3C 9mm caliber pistol, Serial No. ADB972777	ZACHARY HARRIS, RICKVUION SCOTT, MONTREAL WILLIAMS, and MARKENDRA CARTER	MARKENDRA CARTER
3	9/25/23	A Glock Model 19 Gen5 9mm caliber pistol, Serial No. CBNR553; and a Del-Ton, Inc., Model DTI-15 5.56 caliber rifle, Serial No. DTI-S279945	ZACHARY HARRIS, RICKVUION SCOTT, and TEAGUE JACKSON	TEAGUE JACKSON
4	9/26/23	A Glock Model 19 Gen5 9mm caliber pistol, Serial No. CAHF304; a Glock Model 26 Gen5 9mm caliber pistol, Serial No. AHYU056; and a Glock Model 27 .40 caliber pistol, Serial No. BXSL278	ZACHARY HARRIS, RICKVUION SCOTT, and EDWARD WASHINGTON	EDWARD WASHINGTON

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

COUNTS 5-7
(Using an Unauthorized Access Device)

8. On or about the following dates, in the Southern District of Ohio, the defendants, **ZACHARY HARRIS** and **RICKVUION SCOTT**, knowingly, and with intent to defraud,

used an unauthorized access device, to wit: the credit card account number listed below, and by such conduct obtained items with an aggregate value of more than \$1,000, said use affecting interstate and foreign commerce, in that the defendants, **ZACHARY HARRIS** and **RICKVUION SCOTT**, made a purchase via Range USA's website using stolen credit card information and thereby caused a credit card transaction to be processed outside the State of Ohio:

Count	Date, on or about	Unauthorized Access Device Used	Approximate value of items obtained, in aggregate
5	9/25/23	Credit card account number of T.R.	\$1,153.44
6	9/25/23	Credit card account number of M.R.	\$1,891.77
7	9/26/23	Credit card account number of A.C.	\$1,908.03

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNTS 8-10
(Aggravated Identity Theft)

7. On or about the following dates, in the Southern District of Ohio, the defendants, **ZACHARY HARRIS** and **RICKVUION SCOTT**, did knowingly possess and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit: Using an Unauthorized Access Device, in violation of 18 U.S.C. § 1029(a)(2), knowing that the means of identification belonged to another actual person, as specifically identified below:

Count	Date, on or about	Initials of Actual Person	Means of Identification Possessed and Used
8	9/25/23	T.R.	Credit card account number
9	9/25/23	M.R.	Credit card account number

10	9/26/23	A.C.	Credit card account number
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In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FORFEITURE ALLEGATION 1

Upon conviction of any offense set forth in Counts 1 through 7 of this Indictment, the defendants, **ZACHARY HARRIS, RICKVUION SCOTT, TEAGUE JACKSON, EDWARD WASHINGTON, MONTREAL WILLIAMS, and MARKENDRA CARTER**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in such violation(s).

FORFEITURE ALLEGATION 2

Upon conviction of any offense set forth in Counts 5 through 7 of this Indictment, the defendants, **ZACHARY HARRIS and RICKVUION SCOTT**, shall forfeit to the United States: (A) pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such violation(s); and (B) pursuant to 18 U.S.C. § 1029(c)(1)(C), any personal property used or intended to be used to commit the offense(s).

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1), 18 U.S.C. § 1029(c)(2), and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendants, up to the value of the property described above.

A TRUE BILL.

/s/

GRAND JURY FOREPERSON

**KENNETH L. PARKER
UNITED STATES ATTORNEY**

Julie D. Garcia
JULIE D. GARCIA

ASSISTANT UNITED STATES ATTORNEY